

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

Suffolk, ss.

THEODUS JORDAN/// PLAINTIFF

V

BOSTON PUBLIC SCHOOLS/// DEFENDANT

CIVIL ACTION
#04-10688 NMG

**RESPONSE TO DEFENDANTS ANSWER OF PLAINTIFF'S
COMPLAINT OF 2004, RESPECTIVELY**

Here comes the aggrieved plaintiff, in the above case, to ask your High Court to continue in the pursuit of Justice, Equality, Fairness, for the Relief from Suffering and Injury, Destitution, Indigency, and Hardship Bestowed upon plaintiff by the Personal/Institutional Racism inherent within the daily operations of the Boston Public Schools system based on my race, color, gender, age, and /or disability, and, retaliation and "blacklisting", because of this plaintiff's legal right to action as he sought to bring about remedy to chronic racist patterns of discrimination against himself by these defendants.

This plaintiff affirms the following, pursuant to adjudication, remedy, and relief from his suffering in this matter. Plaintiff Affirms both Actionable and Jurisdictional causes for his claims. The defendants in this matter have not been accurate, forthright, forthcoming, honest in their discovery and therefore, its Affirmative Defenses. Therefore, this plaintiff denies all of defendant's affirmative defenses as deliberately misleading, inaccurate, unresearched, negligible, unfounded and maliciously gathered as to undermine this High Court's scope of this entire matter. Plaintiff both affirms and denies the following:

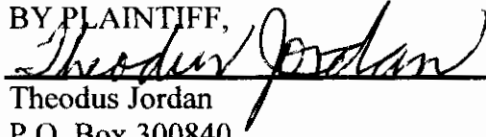
- a) that there is indeed an original and bona-fide and legal claim known by this defendant but defendants choose to ignore;
- b) that this legal and bona-fide legal claim has indeed merit and falls within jurisdictional grounds and statute which is documented;
- c) that this case is not barred by *res judicata* and is therefore, actionable because of its isolation, time-period, and the here-and-present acts of discrimination occurring to this plaintiff during that time, resulting in suffering the loss of job, career, tenure, promotions, income, housing, mortgage, automobiles, tenure, promotions... the ruinness of my reputation, family, livelihood, loss of ability to maintain or establish credit, my good name and my good reputation until race, racism, and racial discrimination, retaliation, blacklisting, age discrimination, disabilities, gender, color of my skin, denied plaintiff equal treatment, equality, equal opportunity, equal access, affirmative action, by denying him a job, his career,

promotions, even though his qualifications far out-matched other whites, Hispanics, or blacks with less education, experience and background as plaintiff;

- d) plaintiff has not only suffered excruciating damages but irreplaceable, irrefutable, and irreparable damages;
- e) plaintiff has indeed presented damages in part but has reserved his right to present full disclosures of all damages when the High Court allows him his day-in-court with a full jury of his peers in the pursuit of justice in this matter;
- f) Plaintiff should not be barred from his pursuit of justice because of the negligence and slowness of other agencies of remedy failures to act, execute, and perform their sworn duty. Including this defendants own slowness, negligible and delay tactics behavior to comply and produce an Answer to this very summon;
- g) to the contrary, every action taken both during the acts of discrimination, before and leading up to this Court case, this defendant has been negligible, denying, road blocking, slow, hiding, contrary, uncooperative, misleading, delaying, manipulative, and malicious in its mishandling of this plaintiff and this case;
- h) the claims put forth in this matter are actionable, and have never been brought forth to this Court before outside of their acts of occurrences, claim's period, and jurisdictional statute and therefore should be transparent to any claims or grounds of estoppels;
- i) Any claims of *waiver* should be treated as any claims of estoppel, plaintiff so plead to High Court;
- j) All plaintiff's claims of disability is a matter of Documented record;
- k) All Administrative remedies have been exhausted and also is a matter of record;
- l) Plaintiff reserve his right to his Court Day, a jury of his peers, and to present all documents, witnesses, and evidences in support of his claims in the pursuit of justice;

Wherefore, plaintiff plead with Your Most Honorable High Court for relief, justice, restore of my job, career, back pay, tenure, promotions, credit restored, home, automobile, reputation, compensatory damages, punitive damages, reinstatement, incremental pay losses, losses, any legal fees, attorney fees, court fees, witness fees, expert witness fees, purging of my records. And, all other legal damages occurring as results of this defendant's direct or indirect racist action that has left this plaintiff indigent, destitute, penniless, in poverty, homeless.... And, any other damages resulting from the action and violations of statutes, denying plaintiff his rights, equality, as seen as discretionary by this Most High Court.

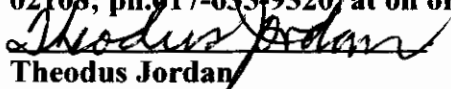
SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS DAY 9/14/05,
BY PLAINTIFF,



Theodus Jordan
P.O. Box 300840
Jamaica Plain, MA 02130-0036
Ph.508-588-6443

CERTIFICATE OF SERVICE

This is to certify that a copy of this document was mailed by prepaid postage to last known address of this defendant and his/her attorneys at Andre Alves Thomas, Asst. Corporation Counsel, Boston Public Schools 26 Court Street, 7th, Flr. Boston , MA 02108; ph.617-635-9320, at on or about 9/14/05, by plaintiff,


Theodus Jordan